

EXHIBIT C

1 12/17/2024 - MARK ZUCKERBERG

2 UNOFFICIAL DRAFT TRANSCRIPT

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18 This draft transcript is intended to
19 assist attorneys in their case preparation and is
20 not to be construed as the final transcript. It is
21 not to be duplicated or sold to other persons or
22 businesses. It is not to be read by the witness or
23 quoted in any pleading, or for any other purpose,

4 raised to me or -- you know, I would assume that
5 there probably were at other levels of the
6 organization, but perhaps we were able to place the
7 appropriate mitigations such that it never got
8 escalated to me.

9 BY ATTORNEY BOIES:

10 Q. My only question was whether any issue
11 regarding the use of copyrighted materials in
12 connection with your AI models ever got escalated to
13 you.

14 ATTORNEY GHAJAR: Same objection.

15 To the extent your answer would refer or
16 relate to privileged communications, I'd caution you
17 not to.

18 THE WITNESS: Sure. And my answer's the
19 same, although I'll keep it shorter this time, that
20 I don't remember any specific conversations about
21 that.

22 BY ATTORNEY BOIES:

23 Q. Do you remember any general conversations
24 about that?

25 A. No, no.

1 Q. You are familiar with a group of works
2 referred to as "Library Genesis" or "LibGen";
3 correct, sir?

4 A. No.

5 Q. You've never heard of LibGen? Is that
6 your testimony?

7 A. I don't think I had, no.

8 I might have -- it might have come up
9 during prep for the deposition with my lawyers, but
10 I don't think I'd heard of it before then. And I'm
11 not sure that was an example that came up during
12 prep for this deposition; so I do not remember
13 having heard of that.

14 Q. What about Books3? Have you ever heard of
15 Books3?

16 A. That, I think, came up in the deposition
17 prep, but I don't think I -- when it came up, I
18 don't recall having been aware of it before.

19 Q. Have you ever -- other than in deposition
20 prep, have you ever been aware of Anna's Archives?

21 A. No, I don't think so.

22 Q. How about "z-lit" or "Z Literature"?

23 A. No.

24 Q. Have you ever heard of shadow libraries?

25 A. No. I don't think I've ever heard that



1 term before.

2 Q. Have you ever heard of torrents or torrent
3 or torrenting?

4 A. Yes.

5 Q. What is your understanding of that?

6 A. Basically, people can -- torrent, I think
7 it's basically an online protocol and system where
8 people can upload files to a distributed network,
9 and then other people can download them from the
10 network.

11 Q. And has Meta ever used that protocol, that
12 torrent protocol, to acquire works used to train
13 Meta's AI models?

14 ATTORNEY GHAJAR: Objection. Lacks
15 foundation. Calls for speculation. Also vague.

16 THE WITNESS: I'm not sure.

17 BY ATTORNEY BOIES:

18 Q. Do you have any information about that at
19 all?

20 ATTORNEY GHAJAR: Same objection. Lacks
21 foundation. Calls for speculation. Also vague.